



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
ECOSYSTEMS, TRIBAL AND  
PUBLIC AFFAIRS

November 17, 2014

Forest Invasive Plant Treatment DEIS  
Phyllis Reed, Project Coordinator  
Mt. Baker Snoqualmie National Forest  
2930 Wetmore Avenue, Suite 3A  
Everett, Washington 98201

Re: U.S. Environmental Protection Agency (EPA) comments on the Mount Baker-Snoqualmie National Forest Invasive Plant Treatment Draft Environmental Impact Statement. EPA Region 10 Project Number: 12-4159-AFS.

Dear Ms. Reed:

We have reviewed the Mount Baker-Snoqualmie National Forest Invasive Plant Treatment Draft Environmental Impact Statement (draft EIS). Our review was conducted in accordance with the EPA's responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Our review of the draft FR/EIS considers the expected environmental impacts of the proposed action and the adequacy of the EIS in meeting the procedural and public disclosure requirements of NEPA. We are rating the draft EIS Lack of Objections (LO). A copy of our rating system is enclosed.

In our April 2, 2012 scoping comments we recognized the Forests' need for improved effectiveness in eradicating, controlling and containing invasive plants. We also stated our belief that the alternative which best meets the project's purpose, "...to achieve the desired condition in the most effective manner possible while...minimizing adverse impacts to people and the environment."<sup>1</sup> - would likely be the environmentally preferable alternative.

Alternative 2, the Proposed Action, best meets the project's purpose and is the environmentally preferable alternative. Alternative 2 is preferable for the following reasons.

- Best chance of controlling and eradicating populations of invasive plants, including the largest densest and most aggressive noxious weed sites. For example, the first choice herbicide aminopyralid would not be available for treatment of over 2,400 acres of aggressive target species, such as hawkweeds and knapweeds in Alternatives 1 or 3. Also, the total cost for treating known infestations and restoring favorable vegetation would be least for Alternative 2.<sup>2</sup>
- Alternative 1 - No Action, and Alternative 3 - No Aminopyralid, have a greater chance of causing adverse impacts to people and the environment. Alternative 3, for example, would treat more acres with triclopyr than Alternative 2. Triclopyr is the only herbicide proposed for use that

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<sup>1</sup> draft EIS, p. 2

<sup>2</sup> draft EIS, p. 89

has Hazard Quotient values above 1, the threshold of concern.<sup>3</sup> Also, the use of aminopyralid - only allowed in Alternative 2 - would improve the Forest Service's ability to treat invasive plants near water, which would help restore riparian habitats.<sup>4</sup>

- Improved processes for new invader/Early Detection and Rapid Response, implementation planning, herbicide use decision criteria, and monitoring.
- Improved Management Requirements and Mitigation Measures

Thank you for this opportunity to comment, and if you have any questions, please contact me at (206) 553-1601 or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov), or Erik Peterson, the lead reviewer for this project. Erik can be reached at (206) 553-6382 or [peterson.erik@epa.gov](mailto:peterson.erik@epa.gov).

Sincerely,



Christine Reichgott, Unit Manager  
Environmental Review and Sediment Management  
Unit

Enclosure:

1. EPA Rating System for Draft Environmental Impact Statements

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<sup>3</sup> draft EIS, p. 104

<sup>4</sup> draft EIS, p. 192

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.